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U.S. Department of Justice

United States Attorney Eastern District of New York MKP/TH/KMT

271 Cadman Plaza East Brooklyn, New York 11201

January 30, 2019

## By E-mail and ECF

The Honorable Nicholas G. Garaufis United States District Judge United States District Court 225 Cadman Plaza East Brooklyn, New York 11201

> United States v. Keith Raniere, et al. Re:

> > Criminal Docket No. 18-204 (S-1) (NGG) (VMS)

## Dear Judge Garaufis:

The government respectfully requests a two-day adjournment for its time to file its motion to admit enterprise evidence, from today until Friday, February 1, 2019. The government has conferred with counsel for all defendants and they do not object to the adjournment request. Additionally, pursuant to Rule IV(C) of the Court's Individual Rules, the government respectfully requests permission to file an oversized memorandum of law of no more than 40 pages in support of this motion.

Respectfully submitted,

RICHARD P. DONOGHUE United States Attorney

By: /s/

> Moira Kim Penza Tanya Hajjar Kevin Trowel

Assistant U.S. Attorneys

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Counsel of record (by ECF) cc: Clerk of Court (NGG) (by ECF) Application grantale